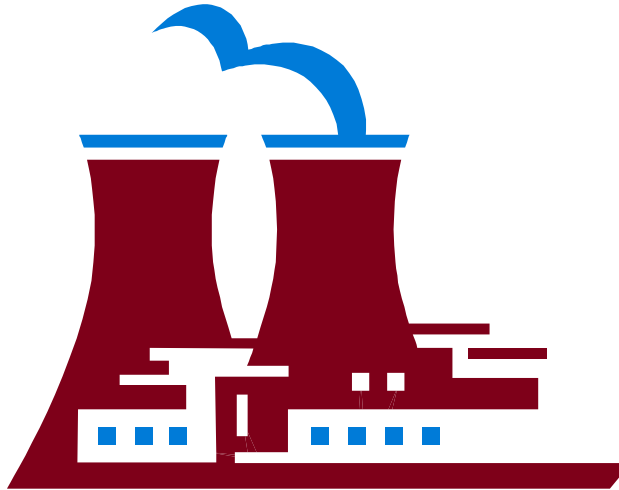


DG 1145 – Section C.I.17
Quality Assurance &
Reliability Assurance



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Division of New Reactor Licensing

Overview

- Section rationale and basis
- Section references
- Chapter 17 highlights
- Pre-Workshop Comments
- Breakout group Q&A

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Rationale and Basis

- Rationale:
 - Provide guidance for 10 CFR Part 52 applicants.
- Technical basis/input from:
 - Regulatory Guide 1.70 REV 3 NOV 1978
 - Draft update to Section 17.5 of Standard Review Plan (NUREG-0800)
 - NEI 04-01E input
 - 10 CFR 50, 10 CFR 50 Appendix B, 10 CFR 52
 - SECY 05-0197

References

- 10 CFR Parts 50, 52 including:
 - 10 CFR 50 Appendix B
- 10 CFR Part 21
- Regulatory Guides
- NUREGS
- NUMARC 93-01
- Generic Letters
- Commission Papers

Chapter 17 Highlights

- Section numbering tracks with SRP sections
- Section 17.5 of DG-1145 gives guidance for all information needed to fully describe QA program
- Construction & Operational QAPDs needed at time of COL application (SECY 05-0197)
- Section 17.4 addresses Reliability Assurance
- Section 17.6 addresses Maintenance Rule
- RTNSS not addressed in Chapter 17; This guidance to be provided elsewhere in DG-1145

Pre-Workshop Comments

1. Prior Industry Comments on SRP section 17.5
2. Level of detail expected in 17.5 of concern
3. Lack of delineation between construction and operational “requirements”
4. Questions on potential to use existing “fleet” QA program
5. Acceptability of NQA-1-1994 versus “most recently endorsed” standard, & RG 1.28/1.33 status relative to NQA-1 and ANS-3.2.

Pre-Workshop Comments

6. Concern for 17.5.1.1 pg 8 item to address sharing of personnel
7. Request to strike commitments that NRC & Industry agreed to delete before (cited 17.5.1.1 pg 8, Items 4 & 8, as examples)
8. 17.5.2 implies QAPD for ops and construction must be IAW SRP 17.5, but many existing QAPDs are IAW SRP 17.3
9. 17.5.3.B second bullet: “list” of SSCs in program vs showing SSCs in drawings or other means determined by the utility

Pre-Workshop Comments

10. Section 17.5.3.F bullet comments: bullet 4 not needed, bullet 5 too much detail
11. Section 17.5.3.P level of detail concern
12. Section 17.5.3.Y—non SR SSCs in QA program—not req'd in current QAPDs & Passive advanced designs: SRP 17.5 vs DG-1145
13. Section 17.5.3.Y too little guidance, not “married” well to SECY94-084 & 95-0132 RTNSS

Pre-Workshop Comments

- 14. Section 17.5.3.Y, no explicit mention of “RTNSS Availability Controls”; suggest appendix or reference to external doc
- 15. Section 17.5.3.Z clarity of wording for independent review processes
- 16. Does Section 17.6 imply MR systems are scoped into the QA Program?
- 17. Not clear what should be in “COLA” vs simply in the QAPD

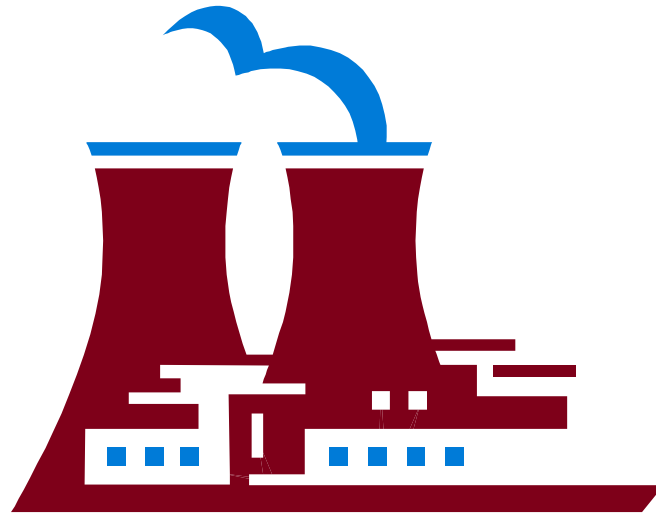
Pre-Workshop Comments

- Section 17.4 Comments:
 - Should COL applic reference generic DCD and add specific info related to applicant scope design?
 - ORAP consistency with Staff response to SRM for SECY 94-084, as seen in SECY 95-132, attachment 2
 - Suggest style of guidance be improved to direct it toward expectations of applicants

Pre-Workshop Comments

- Section 17.6 Comments
 - Concerns for level of detail, scope beyond Maintenance Rule, and need for guidance separating info to place in COL applic vs info that is outside of SAR and subject to audit
 - Some info won't be available until after COL is issued (ex/ SSC list, EOP's). Need to allow for later submittal of info that can't be provided at time of COL
 - Lots of new info in this section—need to have more discussion & future dialog

Breakout Group



**Further questions/comments regarding
Chapter C.I.17 (17.4, 17.5, 17.6) ?**